

Yosef Peretz (SBN 209288)
Emily A. Knoles (SBN 241671)
Michael D. Burstein (SBN 248516)
PERETZ & ASSOCIATES
22 Battery Street, Suite 202
San Francisco, CA 94111
Telephone: 415.732.3777
Facsimile: 415.372.3791

Attorneys for Plaintiffs
YESENIA GUITRON and JUDI KLOSEK

Baldwin J. Lee (Bar No. 187413)
Alexander Nestor (Bar No. 202795)
Amy Morgenstern (Bar No. 267412)
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
Three Embarcadero Center, 12th Floor
San Francisco, CA 94111-4074
Phone: (415) 837-1515
Fax: (415) 837-1516
E-Mail:blee@allenmatkins.com
anestor@allenmatkins.com
amorgenstern@allenmatkins.com

Attorneys for Defendants
WELLS FARGO BANK, N.A., WELLS FARGO & CO. AND
PAM RUBIO

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

YESENIA GUITRON; and JUDI KLOSEK,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.; WELLS
FARGO & CO.; PAM RUBIO; and DOES 1-
20,

Defendants.

CASE NO. CIV-10-03461 CW (MEJ)

**PARTIES' STIPULATION AND
[PROPOSED] ORDER TO EXTEND
PRE-TRIAL EXCHANGE DEADLINE**

1 Plaintiffs YESENIA GUITRON and JUDI KLOSEK and Defendants WELLS FARGO
2 BANK, N.A., WELLS FARGO & CO. and PAM RUBIO stipulate as follows:

3 WHEREAS, the pre-trial exchange and related pre-trial deadlines set by the Court's
4 Order for Pretrial Preparation commence on January 3, 2012 (Dkt. No. 18);

5 WHEREAS the parties will not have completed expert discovery by January 3, 2012;

6 WHEREAS Defendants' Motion to Sever and Motion for Summary Judgment, or in the
7 Alternative Partial Summary Judgment, currently are pending before the Court, and the hearing
8 date has been continued to January 5, 2012, which is after the current deadline for pre-trial
9 exchange;

10 WHEREAS the next case management conference was continued from December 15,
11 2011 to January 5, 2012, together with the hearing date for Defendants' motions;

12 WHEREAS the parties believe they cannot complete the pre-trial exchange and related
13 pre-trial requirements given the issues set forth above;

14 THEREFORE, the parties stipulate and respectfully ask the Court to extend the pre-trial
15 exchange currently due on January 3, 2012, pursuant to the Order for Pre-Trial Preparation
16 Order (Dkt. No. 18) to January 27, 2012.

17 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD:

18
19
20 Dated: December 15, 2011

PERETZ & ASSOCIATES

21 By: (-) Yosef Peretz
22 YOSEF PERETZ
23 Attorneys for Plaintiffs

24 Dated: December 15, 2011

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

25 By: (-) Alexander Nestor
26 ALEXANDER NESTOR
27 Attorneys for Defendants
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[PROPOSED] ORDER

Pursuant to the parties' Stipulation, and Good Cause appearing therefor, the Court hereby orders that the pre-trial exchange currently due on January 3, 2012, pursuant to the Order for Pre-Trial Preparation Order (Dkt. No. 18) is continued to January 27, 2012, and the other pre-trial deadlines set forth in the Order for Pre-Trial Preparation Order are continued accordingly.

IT IS SO ORDERED.

Dated: December 16, 2011

By: 
HON. CLAUDIA WILKEN
U.S. DISTRICT JUDGE